

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
)
Plaintiff,)
)
v.) No. 4:20CR00419 SEP/SPM
)
)
BONMENE SIBE,)
)
)
Defendant.)

GOVERNMENT'S SUPPLEMENT TO REQUEST FOR PRETRIAL DETENTION

Comes now the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Tracy L. Berry, Assistant United States Attorney for said District, and supplements its motion for pretrial detention.

In addition to the information set forth in the Government's motion and the pretrial services report, the Government notes the following:

1. When Defendant was stopped by law enforcement officials on April 30, 2020, he claimed ownership of the 2011 Buick Regal he was driving. The vehicle was unregistered and bore a license plate that had been issued to another vehicle. Defendant was attempting to enter the vehicle when he was arrested on August 29, 2020;¹ and,
2. According to Saint Louis County, Defendant has not paid his property taxes on his home located at 7127 Dawson Place since 2013. As a result, he owes \$8,277.37 in taxes, interests, penalties, and fees. The county provided notice that the property would be offered for sale in its tax sale.

¹ DCD 13. Ownership of the vehicle was missing from the list of assets on Defendant's sworn financial affidavit.

See, Exhibit 1.

Defendant's ownership of his home is in jeopardy because of his failure to pay property taxes for more than seven years. Thus, his ties to the community are not as strong as he suggested to the Court.

Further, Defendant's continued operation of a vehicle without a license and vehicle registration as well as his repeated failures to appear for court hearings indicates a level of irresponsibility and contempt for the rule of law which contradict a claim that he will abide by the conditions of release. Most importantly, this information underscores the finding of the Pretrial Services Officer that Defendant poses a risk of flight if he were granted bond.

Nor will a condition that Defendant submit to electronic monitoring prevent Defendant's flight. Monitoring equipment works only when a defendant does not tamper with the device and keeps it properly charged. Once the device is removed, the defendant would have the ability to travel anywhere. This could include Nigeria through use of a new Nigerian passport or by crossing across the border into Mexico without detection.

Under these circumstances, the Government agrees with the Federal Pretrial Service Office that there are no conditions or combinations of release that will assure Defendant's appearance, and continues to request that Defendant be detained without bond.

Respectfully submitted,

JEFFREY B. JENSEN
UNITED STATES ATTORNEY

/s/ Tracy L. Berry
TRACY L. BERRY, 014573 TN
ASSISTANT UNITED STATES ATTORNEY
Thomas F. Eagleton Courthouse
111 South Tenth Street, 20th Floor
St. Louis, Missouri 63102
(314) 539-2200

CERTIFICATE OF SERVICE

Copy of the foregoing will be sent through the court's electronic case filing system to
Kayla Williams, Esq. this 1st day of September 2020.

s/ Tracy Lynn Berry
ASSISTANT UNITED STATES ATTORNEY